

From: [MCCLINCY Matt](#)
To: [Rene Fuentes/R10/USEPA/US@EPA](#)
Cc: [BAYUK Dana](#); [Chip Humphrey/R10/USEPA/US@EPA](#); [Cinde Donoghue](#); [Eric Blischke/R10/USEPA/US@EPA](#); [Jennifer Arthur](#); [ANDERSON Jim M](#); [Sean Sheldrake/R10/USEPA/US@EPA](#); [Kristine Koch/R10/USEPA/US@EPA](#)
Subject: RE: FW: Gasco Offshore Investigation Plan
Date: 08/07/2006 12:17 PM

All,

I share Rene's frustration with the proposed project schedule and its uncertainties. The proposed modifications appear to be the result of NW Natural finally getting serious about scoping out a cutoff wall design. This is either a good thing or a bad thing given the implications for the off-shore work schedule.

Remember there are two separate efforts here. Phase 1 proposed a series of geoprobes near shore to direct the Phase 2 work. The Phase 1 work will feed both upland source control needs (i.e., stratigraphy, COI distribution and to a limited extent geotech info for a barrier wall design). The Phase 2 work is the in-water TZW of the deeper WBZ that the LWG should be doing, but NW Natural said they would do. Other than the schedule, I am not sure that the proposed work plan addendum significantly changes the ability of the Phase I work to direct the Phase 2 effort. It would however, better support upland source control data needs. Review of the work plan addendum could add back any of the originally proposed Phase 1 work if needed.

I suspect that by drilling off a barge at high water they can place their borings along a barrier wall alignment that would be exposed at low water.

The reality is that the Corps would require a permit for the proposed in-water work anyway, and this would then trigger a consultation with NOAA, although most parties have not been aware of this requirement for in-water sampling. NW Natural now realizes this. The in-water RI work has been proceeding under the CERCLA process which exempts the requirement for the permit, and it is my understanding that EPA's position is that sampling activities are not likely to result in harm so they have not consulted for these activities.

In-water sampling conducted by facilities outside of EPA oversight do not enjoy the CERCLA permit exemption. DEQ agreed to oversee the Gasco off-shore TZW investigation as a courtesy to NW Natural and EPA. If the work is not proceeding on a schedule compatible with the in-water RI EPA needs to clearly articulate their expectations to NW Natural. If the schedule is unacceptably impacted by the requirement for permits, I encourage EPA to reassert them selves as the lead agency.

Matt

-----Original Message-----

From: Fuentes.Rene@epamail.epa.gov [mailto:Fuentes.Rene@epamail.epa.gov]

Sent: Monday, August 07, 2006 8:58 AM

To: MCCLINCY Matt

Cc: BAYUK Dana; [humphrey.chip@epamail.epa.gov](#); [Cinde Donoghue](#); [Blischke.Eric@epamail.epa.gov](#); [Jennifer Arthur](#); [ANDERSON Jim M](#); [Sheldrake.Sean@epamail.epa.gov](#); [Koch.Kristine@epamail.epa.gov](#)
Subject: Re: FW: Gasco Offshore Investigation Plan

All,

It is not clear why the need to obtain a Corps permit (I assume it is for drilling offshore?) is key to this work. Since a barrier wall will most likely be done at the shoreline, it is unlikely that using the barge mounted drill is key to the project. I would suggest that GASCO plan to do the work either from a barge (or from land if the barge permit is likely to be a time constraint) and commit to a firm schedule so we do not begin to slip both the schedule of the ground water offshore AND the newly proposed barrier wall borings, due to the alteration of the plans and the new off-shore drilling requirements implied for the barrier wall borings.

MCCLINCY Matt
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08/07/2006 08:26
AM

To
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cc

Subject
FW: Gasco Offshore Investigation
Plan

Please note NW Natural's proposed modification to their off-shore sampling strategy and date for submittal of a work plan addendum. Please plan on reviewing the addendum and providing comments to DEQ by September 15th.

Chip and Eric, if you have any concerns from the in-water RI perspective about NW Natural's proposal in lieu of moving forward with their existing plan you need to weigh in.

Matt McClincy

-----Original Message-----

From: John Edwards [mailto:jedwards@anchorenv.com]

Sent: Friday, August 04, 2006 9:20 AM

To:

Cc: (b) (6) Carl Stivers; Ben Hung; John Edwards

Subject: Gasco Offshore Investigation Plan

Hello Matt,

During our discussions last Thursday related to the path forward at GASCO, you requested an email message with our proposed schedule to revise and resubmit the Offshore Plan. The plan will be revised to focus Phase 1 borings along the shoreline to gather groundwater quality data and geotechnical data to assess the feasibility of a potential vertical barrier. The objectives of the investigation will be to assess subsurface conditions for a potential vertical barrier and to map the depth of contaminated groundwater along the shoreline.

Phase 1 borings will be located approximately 100 feet apart along the entire Gasco shoreline and up to 400 feet along the adjacent Siltronic. Phase 2 investigations will be determined based on the Phase 1 results. A subset of the Phase 1 shoreline borings will be drilled to basalt bedrock. We are still discussing the intervals for groundwater and deep sediment testing and other details of the plan. The revised Offshore Plan will be submitted to DEQ on Friday, August 25th. In order to help expedite the review and approval of the revised Offshore Plan, the Phase 2 investigations will be handled in a separate addendum.

NW Natural cannot commit to a schedule for completing the Phase 1 shoreline borings until we resolve uncertainties about the need for a Corps permit to conduct the drilling, and about the appropriate drilling method to use. The time requirements to obtain a Corps permit could mean that we would not be able to do the drilling during low water conditions in 2006. If we use a barge mounted drill rig, it may be easier to access the shallow near shore area during higher winter water level conditions in the Willamette. As soon as we resolve the permitting and drilling method questions, we will notify DEQ about our projected schedule for doing the Phase 1 shoreline borings.

Please contact me with any questions or concerns.

John

J

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